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November 22, 1999

Mr. Bill Lowe
U.S. Environmental Protection Agency
Region VII, ARTD/RCAP
Unit Leader
RCRA Corrective Action & Permits Branch
Air, RCRA and Toxics Division
901 N. 5<sup>th</sup> Street
Kansas City, KS 66101

Re:

RCRA Facility Investigation, Phase I Work Plan

EPA Identification No. KSD007246846

Safety-Kleen (Wichita) Facility 2549 North New York Avenue

Wichita, Kansas

Dear Mr. Lowe:

This letter formally requests revisions to the RCRA Facility Investigation Work Plan for the Safety-Kleen Wichita Facility in Wichita, Kansas.

As recently discussed with you and Ms. Chris Jump of KDHE, we would likely to modify the field effort related to the five exploratory borings. The work plan proposes to collect continuously-sampled soils using a standard auger rig. Concerns with heaving sands in this region have led us to reconsider this approach. After researching the various options for logging these holes, we propose to use the GeoProbe® Conductivity Probe, which will generate electrical conductivity logs instead of physical soil samples. After many discussions with individuals experienced with this equipment and after conducting a literature search on the topic, we believe that this technology will provide dependable results that can easily be interpreted into lithologic units. At a minimum, one confirmation boring will be drilled and continuously logged adjacent to one of these locations during the monitoring well installation phase of the Stage 1 RFI.

Additionally, we are conducting a prescreening of certain areas of the site to evaluate the potential presence of low level radiation in the surface soils, based upon information provided to us by KDHE. The instrument used in the prescreening (a Ludlum or similar meter) will also be used in the field during sampling for Health & Safety screening purposes.

We are scheduled to be in the field Monday, November 29, 1999. Mr. Ron Robertson, the facility environmental manager, is expecting you and has indicated that he will be happy to give you and Ms. Jump a tour of the facility. Mr. Steve Lynn will be heading up our field effort. He should be on site in the afternoon of the 29<sup>th</sup>. (Note: A subcontractor will be on-site that morning conducting the radiation screening.)

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RCRA RECORDS CENTER

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If you have any questions on this matter, please contact me at 303.938.5535.

Sincerely,

Kay L. Tauscher, CPG Project Hydrogeologist

Cc: C. Jump



## FAX TRANSMISSION

FAX TO: Bill Lowe

9135517947 **FAX NO.:** 

COMPANY: USEPA

PAGE:

FROM:

DATE:

11/22/99

RCRA Branch Kay Tauscher

**COMMENTS:** 

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A Safety-Kleen Company



5665 Flatiron Parkway, Boulder, Colorado, 80301 Phone: (303)938-5500 FAX: (303)938-5520



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